

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	
	)	
v.	)	No. 4:23 MJ 1057-1 JMB
	)	
FRANCISCO MANUEL MATA-MARTINEZ,	)	
	)	
Defendant.	)	

**MOTION FOR PRETRIAL DETENTION AND HEARING**

COMES NOW the United States of America, by and through its attorneys, Saylor A. Fleming, United States Attorney for the Eastern District of Missouri, and Dane A. Rennier, Assistant United States Attorney for said District, and moves the Court to order defendant detained pending trial, and further requests that a detention hearing be held three (3) days from the date of defendant's initial appearance before the United States Magistrate pursuant to Title 18, United States Code, Section 3141, et seq.

As for its grounds for detention, the government requests this Court to consider the following factors pursuant to Title 18, United States Code, Section 3142:

1. The defendant is charged with an offense for which the maximum term of life imprisonment is prescribed in the Controlled Substances Act (21 U.S.C. 801 et seq.), possession with the intent to distribute a controlled substance in violation of Title 21, United States Code, Section 841(a)(1). *See* 18 U.S.C. § 3142(e)(3)(A) and (f)(1)(C).

2. The offense triggers a rebuttable presumption of detention pursuant to Title 18, United States Code, Sections 3142(e)(2)(A) and (3)(A). There are no conditions or combination of conditions which will reasonably assure the appearance of the defendant as required, and the safety of any other person and the community.

3. There are no conditions or combination of conditions which will reasonably assure the appearance of the defendant as required, and the safety of any other person and the community. Title 18, United States Code, Section 3142(g) requires this Court to consider the nature and characteristics of the offense charged, the weight of the evidence against the defendant, defendant's history and characteristics, and the nature and seriousness of the danger to any person or the community that would be posed by the defendant's release.

4. Section 3142(9)(2) requires this Court to consider the weight of the evidence against the defendant. The government submits that the evidence against the defendant is strong. Defendant was involved in a conspiracy to distribute methamphetamine and fentanyl in the Eastern District of Missouri. Defendant is not a United States citizen and has no ties to the Eastern District of Missouri. Defendant has strong ties to the country of Mexico and could easily integrate into life in a foreign country if released. The quantity of methamphetamine exceeded 25 kilograms and the quantity of fentanyl exceeded 8 kilograms. Defendant also fled from law enforcement on February 6, 2023.

WHEREFORE, the Government requests this Court to order defendant detained prior to trial, and further to order a detention hearing three (3) days from the date of defendant's initial appearance.

Respectfully submitted,

SAYLOR A. FLEMING  
United States Attorney

/s/ Dane A. Rennier  
DANE A. RENNIER, #67299MO  
Assistant United States Attorney

**CERTIFICATE OF SERVICE**

I hereby certify that on February 9, 2023, the foregoing was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system upon all counsel of record.

/s/ Dane Rennie

DANE RENNIE #67299MO

Assistant United States Attorney